

## **Remarks**

Upon entry of the foregoing amendment, claims 1-11 are pending. Claim 1 has been amended, and new claim 11 has been added. Applicant submits that no new matter has been added. In view of the foregoing amendment and following remarks, allowance of all the claims pending in the application is requested.

### ***Rejection of Claims Under 35 U.S.C. §§ 102(b) and 103 Based on McCarbria***

Claims 1-10 stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by McCarbria *et al.* (U.S. Patent No. 5,773,903). Applicant disagrees with the rejections set forth by the Examiner as McCarbria does not disclose, teach or suggest all of the elements of the claimed invention.

McCarbria relates to the cooling arrangement of a rectifier assembly which is carried inside a rotor shaft. Oil from an oil supply is introduced into the central portion of the shaft. The oil flows into the opening of the rectifier assembly and radially and outwardly through the holes 62. In the event that debris manages to contaminate the oil entering the rectifier assembly, it is merely be swept towards and through the holes 62. Given the large number of exit holes 62, it is highly unlikely that a sufficient number of these would become blocked in order to reduce the oil flow sufficiently to cause inadequate cooling.

In contrast to McCarbria, the invention of claim 1 includes a separator and an aperture having a third width in the path intermediate to the separator and the outlet, with the third width being less than a second width of the outlet. McCarbria does not disclose at least these features. For at least this reason, claim 1 is patentable over McCarbria.

However, in the interest of expediting prosecution, claim 1 have been has been amended to clarify additional aspects of the invention. Amended claim 1 clarifies that the fluid distribution device of the present invention includes an outlet which provides a flow of cooling fluid to a device to be cooled. Therefore, the device to be cooled in the present application is located downstream of the outlet. The devices to be cooled in

McCarbria are located upstream of the outlet rather than downstream of the outlet. For at least this additional reason, claim 1 is patentable over McCarbria.

Claims 2-10 depend from and add additional features to claim 1. Accordingly, these claims are patentable over McCarbria for at least the same reasons set forth above.

***Rejection of Claims Under 35 U.S.C. §§ 102(b) and 103 Based on Krinickas***

Claims 1-10 also stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Krinickas *et al.* (U.S. Patent No. 5,003,207). Applicant disagrees with the rejections set forth by the Examiner because Krinickas does not disclose does not disclose, teach or suggest all of the elements of the claimed invention.

Krinickas relates to an arrangement for accepting oil from an oil filled rotor shaft and spraying the oil onto overhanging windings mounted on the stator. In Krinickas, the cooling fluid flows through an aperture 50, then subsequently enters an orifice 54 leading to a radial tube 56. The radial tube exits in an end winding spraying cooling orifice 58 allowing the cooling fluid to spray onto end windings 22. It can be seen that the orifice 54 has a larger width than the subsequent path of tube 56, tapered end 51, and end orifice 58. This is significant because any debris that passes into the orifice 54 may block tube 56 because the entry of pipe 56 is wider than its exit, thereby inhibiting the cooling action.

In contrast to Krinickas, the invention of claim 1 includes an aperture having a third width *in the path intermediate to the separator and the outlet*, with the third width being less than a second width of the outlet. Krinickas does not disclose at least this feature because the width of orifice 54 (which is in the path intermediate to the separator and the outlet) is greater than the width of the subsequent path consisting of tube 56, tapered end 51, and end orifice 58. For at least this reason, claim 1 is patentable over Krinickas.

In addition, claim 1 as amended clarifies that solid matter passing through the at least one aperture can pass through the outlet because the width of the aperture is less

than the width of the outlet. Therefore, any debris entering the delivery path (through the at least one aperture) can be guaranteed to exit the delivery path because the outlet is wider than the entrance. However, in Krinickas, the entrance 54 to the delivery path is wider than the rest of the delivery path and hence debris entering the delivery path can get stuck therein. For at least this additional reason, claim 1 is patentable over Krinickas.

Furthermore, since Krinickas deliberately includes a ball-bearing 53 and spring arrangement 55 to restrict the fluid flow path from the orifice 54 to the orifice 57, it is clear that Krinickas teaches away from the present invention since it deliberately introduces a construction between the aperture and the outlet. The invention as claimed makes sure that the outlet, and indeed the entirety of the fluid flow path subsequent to the at least one aperture, has a width larger than the at least one aperture. For at least this additional reason, claim 1 is patentable over Krinickas.

Claims 2-10 depend from and add additional features to claim 1. Accordingly, these claims are also patentable over Krinickas for at least the reasons set forth above.

### **Conclusion**

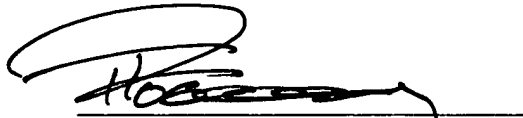
Having addressed each of the foregoing rejections, it is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, the application is in condition for allowance. Notice to that effect is respectfully requested.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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Respectfully Submitted,

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